

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

GLORIA VALDEZ,

Plaintiff,

v.

**METHODIST HOSPITALS OF DALLAS
D/B/A METHODIST HEALTH SYSTEM,**

Defendant.

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CIVIL ACTION NO. 3:23-CV-02327-B

**DEFENDANT METHODIST HOSPITALS OF DALLAS D/B/A METHODIST HEALTH
SYSTEM'S REQUESTED VOIR DIRE QUESTIONS**

Defendant Methodist Hospitals of Dallas d/b/a Methodist Health System ("Methodist" or "Defendant") submits these proposed voir dire questions and asks that these questions be submitted to the jury panel during voir dire:

Prior Experience:

1. Have you ever served on a jury before? If your answer is "yes," please explain the nature of the case, whether it was civil or criminal, what issues were involved, and what decision was reached.
2. Have you or anyone close to you (family or friend) ever been in a lawsuit before?
 - a. As a party?
 - b. As a witness?

If you answer was "yes" to either, please state the circumstances of the lawsuit, when it occurred, the subject matter of the lawsuit, and the resolution of the lawsuit.

3. Are any of you an attorney, paralegal, or have any legal training?

Knowledge of Lawsuit and Attorneys:

4. Before coming here today, have you heard or read anything about this lawsuit?
5. Do you know or have you heard of the Plaintiff Gloria Valdez? If so, briefly explain how you know her.

6. Do you know or have you heard of the Plaintiff's attorneys, Brittney Thompson, Matthew Scott, or Jamie Gilmore, or their firm, Scott Gilmore Thompson? If so, briefly explain how you know Plaintiff's attorney or your previous dealings with their law firm.
7. Have you or anyone close to you (family or friend) ever been employed by or applied for employment with the Defendant Methodist Hospitals of Dallas, Methodist Health System, or a related company? This includes Methodist Dallas Medical Center, Methodist Charlton Medical Center, Methodist Mansfield Medical Center, Methodist Richardson Medical Center, Methodist Midlothian Medical Center, and Methodist Southlake Medical Center.

If so, please raise your hand and tell us who is (or was) employed, where they are or were employed, how long the person has been (or was) employed, what position the person is (or was) employed in, and what your relationship to that person is.

8. In addition to Plaintiff Gloria Valdez, some or all of the following people may testify as witnesses in this case:
 - a. Karen Castro
 - b. Elizabeth Parker
 - c. Priyanka Acharya
 - d. Colette Ngo Ndjom
 - e. Kristen Dunlap
 - f. Jim O'Reilly
 - g. Dr. Crystee Cooper
 - h. Lauren Brady
 - i. Mykaylah Henderson
 - j. Bethany Brauer
 - k. Brittney Parker

Do you know or have you heard of any of these individuals? If so, how do you know them?

9. Do you know or have you heard of Methodist's attorneys, Robin Shaughnessy, Paul Nason, Seth Roberts, or Aaron Nava, or their firm, Locke Lord LLP? If so, briefly explain how you know Methodist's attorney(s) or your previous dealings with their law firm.

Healthcare/Clinical Trials:

10. Are any of you a physician, nurse or other medical professional? Do any of you have any experience working in the health care industry, including clinical trials? If your answer is “yes,” please describe your experience.
11. Have any of you had a bad experience with a doctor, nurse, or other medical worker at a hospital or medical clinic? Tell us about that experience. How did it make you feel about healthcare institutions, doctors, nurses, and hospitals?
12. Does anyone have any feelings—good or bad—about Methodist Hospital of Dallas? If your answer is “yes,” please explain.
13. Have any of you or anyone close to you received medical treatment from Methodist Hospitals of Dallas, Methodist Health System, or any related hospitals or clinics? This includes Methodist Dallas Medical Center, Methodist Charlton Medical Center, Methodist Mansfield Medical Center, Methodist Richardson Medical Center, Methodist Midlothian Medical Center, and Methodist Southlake Medical Center had any experience with Methodist hospital? If yes, briefly describe the treatment you or anyone close to you received.
 - a. Do you or any of your family members have any reason to complain about Methodist or any of these related hospitals or clinics?
 - b. Do you or any of your family members currently owe any amount of money to Methodist for medical treatment you received from Methodist or any of these related hospitals or clinics?
14. Do any of you have strong feelings—good or bad—about clinical research trials involving testing new drugs? If your answer is “yes,” please explain.
15. Have you or any of your family members ever participated in a clinical research trial?
 - a. Please describe the clinical research trial.
 - b. Did you or any of your family members have a negative reaction or side effect to the drug during the clinical research trial? If your answer is “yes,” please describe the negative reaction or side effect.

Employment-Related Questions:

16. Have any of you experienced a job-related decision that affected you personally and with which you strongly disagreed?
 - c. To those who answered “yes,” what was the reason for the decision? Was it fair? Did you agree? If not, what was your belief?

- d. To those who answered “yes,” do you feel that the decision results in your harboring any animosity or ill feeling against employers in general?
 - e. Would the decision, or your feelings about the decision, affect you or possibly prevent you from rendering a fair, impartial, and unbiased verdict in this case?
- 17. Do any of you believe that employers generally discriminate against or mistreat their employees?
 - 18. Have any of you or someone close to you ever lost a job involuntarily? If so, did you consider the circumstances to be improper or illegal? Why?
 - 19. Have you or any of your family or close friends ever been subjected to treatment on the job that you considered to be discrimination?
 - 20. Have any of you ever worked as a supervisor? Are you familiar with the duties and responsibilities of a supervisor?
 - 21. Do you understand that even though treatment may seem unfair, that it may not rise to the level that allows a person to seek relief in a lawsuit?
 - 22. Does anyone believe that an employer has to have a good reason to terminate an employee?
 - 23. Do any of you believe that an employee must be given the benefit of the doubt in any dispute with his or her employer?
 - 24. Does anyone believe that the burden of proof is on the employer to justify its termination decision?
 - 25. Have you or anyone close to you (family or friend) ever filed a claim of discrimination or retaliation against any employer? If your answer is “yes,” please describe the alleged discrimination or retaliation and how the matter of discrimination was resolved.
 - 26. Is anyone here familiar with the Family and Medical Leave Act (FMLA)? Has anyone here ever taken FMLA leave or other medical leave from work?
 - 27. Have you or your significant other ever been pregnant while you or they were working?
 - 28. Has anyone here ever had to take time off work because of pregnancy complications or to take care of a new baby or a sick relative?
 - 29. Has anyone here needed time off work because of pregnancy complications or to take care of a new baby or sick relative, but wasn’t able to get the time off work? If your answer is “yes,” did you think the employer’s decision was wrong? Why?

Miscellaneous:

- 30. It will become apparent during the trial of the case that the Plaintiff is an individual, while Methodist is a company. Under the law, all parties are entitled to a fair and impartial trial.

Do any of you feel that, because the Plaintiff is an individual and Methodist is a company, you would have difficulty deciding these questions of fact solely on the basis of the evidence presented during the trial and in accordance with the instructions on the law given you by the Court? If so, please raise your hand.

31. The jury selected in this case will be required to decide factual issues submitted to it solely on the basis of the evidence submitted during the course of the trial and not on the basis of any feelings of sympathy or prejudice that any member of the jury may have with respect to the parties or their counsel. Are there any of you who believe that if you are selected to serve on this jury, it would be difficult for you to decide the questions submitted to you solely on the basis of the evidence presented during the trial because of (a) some feelings of sympathy you may have for one of the parties or (b) some bias or prejudice you may feel against one of the parties? If so, please raise your hand and tell us what difficulty you might have in this regard.
32. Do any of you believe that a plaintiff, that is, a person who sues someone else, is automatically entitled to recover money damages just because he or she brought a lawsuit?
33. Do you agree that people should accept responsibility for themselves? Do you know anyone that always blamed everything on someone else? It's never their fault it's always someone else who is responsible?
34. Does anyone have any feelings—good or bad—about the North Texas Conference of the United Methodist Church? If your answer is “yes,” please explain.
35. Do you have any philosophical, religious or other beliefs that would prevent you from rendering a verdict in this case?
36. Is there any other reason you feel you cannot serve, or that it would be inappropriate for you to serve, as a juror in this case?

Dated: October 29, 2024

Respectfully submitted,

/s/ Robin G. Shaughnessy

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**ATTORNEYS FOR DEFENDANT
METHODIST HOSPITALS OF DALLAS
D/B/A METHODIST HEALTH SYSTEM**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon the following counsel of record by *ECF electronic mail* on this 29th day of October 2024:

Matthew R. Scott

Jamie J. Gilmore

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/s/ Robin G. Shaughnessy

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